

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

*

Criminal Case No. JKB-23-0278

CHRISTOPHER BENDANN

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MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS

COMES NOW the defendant, Christopher Bendann, through counsel, Christopher C. Nieto, Esq., who hereby moves this Court for leave to file additional motions. In support thereof, he states as follows:

1. The defendant, Christopher Bendann, is charged in a multi-count indictment with five counts of Sexual Exploitation of a Minor and one count of Possession of Child Pornography, in violation of 18 U.S.C. § 2251(a) and § 2252A(a)(5)(B).

2. The Government has provided some discovery to Mr. Bendann, but counsel anticipates that more additional discovery will be forthcoming. Defense, therefore, has not been able to determine the precise grounds for all possible pre-trial motions at this point.

3. Additional motions may become necessary during the course of the discovery process in this case.

4. Mr. Bendann also requests leave to withdraw any motion, prior to any ruling by the Court, if the relief requested in such motion is no longer desired or appropriate.

WHEREFORE, Mr. Bendann requests that the Court allow him to amend, supplement, withdraw, or file additional motions as necessary, and grant such other relief as the nature of his case may require.

Respectfully submitted,

/S/

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CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2023, a copy of Defendant's Motion was electronically filed, via ECF, and notice of said filing was emailed to Assistant United States Attorney Colleen McGuinn and Kim Hagan.

/s/

Christopher C. Nieto, #30031
Attorney for Mr. Bendann